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6	Counsel for Defendant Don Andreas		
7	Counsel for Bereilaum Bon / marcas		
8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
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11	LARA WARD, and individual,	CASE NO.: 2:17-cv-03029-JAD-NJK	
12	Plaintiff,	2.17 07 03027 0113 11012	
13	VS.	STIPULATION AND [PROPOSED] ORDER TO EXTEND THE TIME FOR	
14	STATE OF NEVADA, ex rel. its BOARD OF MEDICAL EXAMINERS, DON ANDREAS, an	DEFENDANT DON ANDREAS TO RESPOND TO THE COMPLAINT	
15	individual, PAMELA CASTAGNOLA, an individual, KIM FRIEDMAN, an individual,	(First Request)	
16	KATI PAYTON, an individual, TODD RICH, an individual, EDWARD COUSINEAU, an		
17	individual, and DOES I - X,		
18	Defendants.		
19	Defendant Don Andreas ("Defendant")	and Plaintiff Lara Ward ("Plaintiff"), by a	
20	Defendant Don Andreas ("Defendant") and Plaintiff Lara Ward ("Plaintiff"), by through their respective counsel of record, hereby stipulate and agree as follows:		
21	1. Defendant was served with the Summons and Complaint (ECF No. 1) in this of		
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- case on January 10, 2018, and Defendant's deadline to respond to the Complaint is January 31, 2018.
- 2. Prior to Defendant being served in this case, the other defendants, which were served earlier, filed a Motion to Dismiss (ECF No. 17), a Motion to Strike (ECF No. 18), and a Motion for a More Definite Statement (ECF No. 19). A hearing on those motions is scheduled for February 5, 2018 (ECF No. 21).
 - 3. To avoid motion or pleading work by Defendant, which could be rendered moot by

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1	the Court's decision at the hearing on February 5, 2018, Defen	dant, Plaintiff, and their respective	
2	counsel are in agreement that Defendant should have until 14 days after the Court's decision at the		
3	February 5, 2018 hearing or 14 days after Plaintiff files an amended complaint if the Court so		
4	allows, whichever is later, to respond to the Complaint or an amended complaint in this action.		
5	4. This is the first request for an extension of this deadline. This stipulation is not		
6	made for the purposes of delay but is brought in good faith to promote efficiency avoid unnecessary		
7	7 cost.		
8	8 Dated this 29th day of January, 2018 Dated this 29	th day of January, 2018	
9	9 GARG GOLDEN LAW FIRM HKM EMPL	OYMENT ATTORNEYS LLP	
10	10		
11	By /s/ Anthony B. Golden By /s/ Jenny	L. Foley	
12	12 Nevada Bar No. 9563 Nevada Ba	FOLEY, Ph.D., ESQ. ar No. 9017	
13	13 Henderson, Nevada 89052 Las Vegas	Sahara Ave., Suite 325 , Nevada 89104	
14	(702) 850-0202 (702) 625- Counsel for Defendant Don Andreas Counsel for		
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